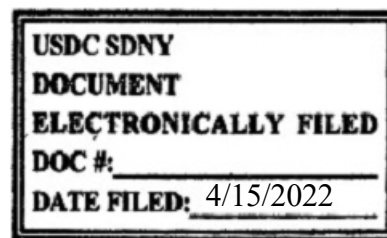


MEMO ENDORSED

HON. SYLVIA O. HICKS-RADIX
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THE CITY OF NEW YORK
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April 14, 2022

VIA E.C.F.

Honorable Barbara Moses
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 11201

Re: Bahadoran v. City of New York et al.
21-cv-04884 (JMF)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hicks-Radix, Corporation Counsel of the City of New York, representing defendants in the above-referenced action. I write respectfully to request an adjournment of the settlement conference scheduled for April 18, 2022 at 2:15 p.m. to such other date convenient to the Court after May 1, 2022. Defendants apologize for the lateness of this request and are mindful of the Court's Rules requiring that adjournment requests be made at least one week in advance of the scheduled conference. However, as explained below, given the particulars of this case, and that defendants only recently received plaintiff's settlement demand, defendants find they need more time to evaluate this case and extend an offer that might realistically result in a settlement. Accordingly, adjourning this settlement conference would serve to further the chances of reaching an early settlement of this matter. Plaintiff's counsel consents to this requested adjournment.

The adjournment is necessary because defendants need more time to evaluate and reply to plaintiff's formal settlement demand and supporting documents, which they received on April 11, 2022. Given the extent of plaintiff's settlement demand, which is in the multi-million dollar range, and the seriousness of plaintiff's claimed damages (partial paralysis), any counter offer made by the City must be approved and vetted through multiple channels before authority is granted. Despite diligent efforts of the undersigned to accomplish this vetting process in advance of the scheduled conference date, it unfortunately could not be done. Accordingly, in

the interests of having a productive settlement conference, it is respectfully submitted that the best course of action would be to adjourn the settlement.

No previous request for an extension of the conference date has been made by either party. Defendants previously moved for an extension of their time to submit their pre-settlement statement to April 14, 2022, which was granted by the Court on that date (see ECF Docket No. 25). Granting this request would not affect any other previously scheduled dates. Accordingly, it is respectfully requested that the Court grant the instant application to adjourn the settlement conference scheduled for April 18, 2022 to such other date convenient to the Court after May 1, 2022.

I thank the Court for its consideration of the foregoing.

Respectfully submitted,

s/ Steve Stavridis

Steve Stavridis
Senior Counsel

cc: All counsel of record (by E.C.F.)

Application GRANTED. The settlement conference scheduled for April 18, 2022 is ADJOURNED to **May 18, 2022 at 2:15 p.m.** The parties shall file their respective confidential settlement letters no later than **May 11, 2022.** SO ORDERED.



BARBARA MOSES
United States Magistrate Judge
April 15, 2022